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November 18, 2022

BY ECF

Honorable Jennifer L. Rochon
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Inventia Healthcare Limited v. Apnar Pharma LP, 22 CV 7254 (JLR)

Dear Judge Rochon,

We are counsel to defendant Apnar Pharma LP (“Apnar Pharma”), in the above-referenced matter and write with the consent of plaintiff’s counsel to respectfully ask the Court for a further extension of time to answer, move or otherwise respond to the complaint in this matter, from November 18, 2022 to and including December 19, 2022.

I am informed that the parties have finally reached a settlement in principle late last night and require additional time to prepare definitive documentation. The uncertain status of the settlement in principle delayed this request, and I apologize for any inconvenience this causes to the Court.

We also request an adjournment of the pretrial conference scheduled for November 30, 2022 to a date following December 19, 2022.

Motion to Adjourn the Date to Respond to the Complaint

Pursuant to Section 1.F. of the Court’s Individual Practices, Apnar Pharma states as follows with respect to motion to adjourn the date to respond to the Complaint:

- (1) The request seeks an extension of time to answer, move or otherwise respond to the Complaint by 30 days, from November 18, 2022 to December 19, 2022.
- (2) This is the third extension request of this deadline. The response to the Complaint was originally due on September 19, 2022. By letter motion dated September 13, 2022 (Docket 7) Apnar Pharma requested an extension of 30 days in which to answer, move or otherwise respond to the complaint, to and including October 19, 2022. Judge Broderick granted this request by Order dated September 14, 2022 (Docket 8). By letter motion dated October 13, 2022, Apnar Pharma requested a further extension of 30 days, to November 18, 2022 (Docket 12), which this Court granted on October 14, 2022 (Docket 13).
- (3) Plaintiff’s counsel consents to this request.

Motion to Adjourn the Pretrial Conference

Pursuant to Section 1.F. of the Court's Individual Practices, Apnar Pharma states as follows with respect to motion to adjourn the date pretrial conference:

- (1) The request seeks an adjournment of the pretrial conference scheduled for November 30, 2022 to a date following December 19, 2022.
- (2) This is the second such request for an adjournment of this deadline.
- (3) Plaintiff's counsel consents to this request.
- (4) While we do not believe this conference will be necessary, the parties are both available December 19-22 and 27-28.

Respectfully Submitted,



Joshua D. Rievman

Copy: Aaron Loterstein, Esq.